

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:	:	Chapter 11
	:	
ZEN JV, LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 25-11195 (JKS)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	<b>Objection Deadline:</b>
	:	<b>September 15, 2025 at 4:00 p.m. (ET)</b>
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**COVER SHEET FOR FIRST MONTHLY APPLICATION  
OF LATHAM & WATKINS LLP FOR COMPENSATION FOR SERVICES  
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED AS BANKRUPTCY  
COUNSEL FOR THE PERIOD FROM JUNE 24, 2025 THROUGH JULY 31, 2025**

Name of applicant:	<u>Latham &amp; Watkins LLP</u>
Authorized to provide professional services to:	<u>Debtors and Debtors-in-Possession</u>
Date of retention:	<u>August 11, 2025, effective as of June 24, 2025</u>
Period for which compensation and reimbursement are sought:	<u>June 24, 2025 through July 31, 2025</u>
Amount of compensation sought as actual, reasonable, and necessary:	<u>\$3,073,816.75 (80% = \$2,459,053.40)</u>
Amount of expense reimbursement sought as actual, reasonable, and necessary:	<u>\$5,934.33</u>

This is a(n):  X  monthly   interim   final application

This monthly application includes 0.0 hours with a value of \$0.00 incurred in connection with the preparation of fee applications.

Prior Applications Filed: **None**

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each debtor's federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors' address is 200 N LaSalle Street #900, Chicago, IL 60601.

**COMPENSATION BY PROFESSIONAL**

<b>Name of Professional</b>	<b>Position; Date of Hire; Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate<sup>2</sup></b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Kronsoble, Joseph M.	Partner. Joined firm in 1991. Member of Illinois Bar since 1991. Member of Tax Department.	\$2,650.00	3.60	\$9,540.00
Schrock, Ray C.	Partner. Joined firm in 2024. Member of Illinois Bar since 1998. Member of New York Bar since 2010. Member of Restructuring Department.	\$2,550.00	16.10	\$41,055.00
Murphy, Erin	Partner. Joined firm in 2020. Member of New York Bar since 2001. Member of California Bar since 2019. Member of Tax Department.	\$2,325.00	4.40	\$10,230.00
Jefcoat, Kyle R.	Partner. Joined firm in 2004. Member of New York Bar since 2000. Member of District of Columbia Bar since 2005. Member of Litigation Department.	\$2,195.00	2.80	\$6,146.00
Ollivierre, Scott C.	Partner. Joined firm in 2013. Member of New York Bar since 2010. Member of Finance Department.	\$2,095.00	28.30	\$59,288.50
Sorkin, Andrew	Partner. Joined firm in 2019. Member of New York Bar since 2008. Member of District of Columbia Bar since 2016. Member of Restructuring Department.	\$2,095.00	2.80	\$5,866.00
Walker, Jessica Diane E.	Partner. Joined firm in 2020. England and Wales (Solicitor), 2008. Member of Finance Department.	\$2,095.00	2.30	\$4,818.50
Arthur, Candace M.	Partner. Joined firm in 2024. Member of New York Bar since 2010. Member of Restructuring Department.	\$2,046.54 <sup>3</sup>	123.90	\$253,285.50
Brubaker, Morgan E.	Partner. Joined firm in 2016. Member of District Of Columbia Bar since 2015. Member of Corporate Department.	\$1,980.00	64.00	\$126,720.00
Gardiner, Drew T.	Partner. Joined firm in 2004. Member of California Bar since 2004. Member of Litigation Department.	\$1,980.00	4.30	\$8,514.00
Brown, Robert W.	Partner. Joined firm in 2021. Member of New York Bar since 2013. Member of Texas Bar since 2018. Member of Corporate Department.	\$1,980.00	42.90	\$84,942.00
Kaplan, Binyomin	Counsel. Joined firm in 2022. Member of New York Bar since 2001. Member of Corporate Department	\$1,980.00	230.80	\$456,984.00

<sup>2</sup> All non-working travel time has been billed at 50% of the normal hourly rate.

<sup>3</sup> Blended rate includes non-working travel time billed at 50% of the normal hourly rate and rates as indicated in Retention Application.

<b>Name of Professional</b>	<b>Position; Date of Hire; Year of Obtaining License to Practice</b>	<b>Hourly Billing Rate<sup>2</sup></b>	<b>Total Hours Billed</b>	<b>Total Compensation</b>
Quay, Richard R.	Counsel. Joined firm in 2022. Member of New York Bar since 2012. Member of Corporate Department.	\$1,980.00	6.70	\$13,266.00
Waller, Laura Marie D.	Counsel. Joined firm in 2020. Member of Illinois Bar since 2004. Member of Tax Department.	\$1,875.00	10.70	\$20,062.50
Clore, Ryan D.	Counsel. Joined firm in 2016. Member of Maryland Bar since 2016. Member of District of Columbia Bar since 2018. Member of Corporate Department.	\$1,635.00	40.20	\$65,727.00
Lim, Christopher W.	Associate. Joined firm in 2017. England and Wales (Solicitor), 2019. Member of California Bar since 2021. Member of Corporate Department.	\$1,635.00	296.40	\$484,614.00
Kutilek, Lukas	Associate. Joined firm in 2021. Member of New York Bar since 2019. Member of Tax Department.	\$1,635.00	4.20	\$6,867.00
Brunning, Alice E.	Associate. Joined firm in 2021. England and Wales (Solicitor), 2017. Member of Privacy and Cyber Department.	\$1,635.00	2.00	\$3,270.00
Gordon, Jonathan	Associate. Joined firm in 2020. Member of Illinois Bar since 2018. Member of Restructuring Department.	\$1,567.71 <sup>4</sup>	233.70	\$366,158.25
Barkow, Joshua	Associate. Joined firm in 2022. Member of New York Bar since 2021. Member of Corporate Department.	\$1,560.00	49.40	\$77,064.00
Wang, Victor	Associate. Joined firm in 2024. Member of New York Bar since 2021. Member of Corporate Department.	\$1,560.00	44.40	\$69,264.00
Zhang, Jiaheng	Associate. Joined firm in 2025. Member of New York Bar since 2021. Member of Restructuring Department.	\$1,560.00	51.30	\$80,028.00
Russell, Benjamin A.	Associate. Joined firm in 2019. England and Wales (Solicitor), 2021. Member of Finance Department.	\$1,515.00	5.50	\$8,332.50
Waterman, Katherine	Associate. Joined firm in 2025. Member of New York Bar since 2022. Member of Finance Department.	\$1,465.00	14.20	\$20,803.00
Cobb, Stuart	Associate. Joined firm in 2025. Member of Texas Bar since 2021. Member of Corporate Department.	\$1,465.00	47.80	\$70,027.00

<sup>4</sup> Blended rate includes non-working travel time billed at 50% of the normal hourly rate and rates as indicated in Retention Application.

Name of Professional	Position; Date of Hire; Year of Obtaining License to Practice	Hourly Billing Rate <sup>2</sup>	Total Hours Billed	Total Compensation
Hecht, Elliot W.	Associate. Joined firm in 2022. Member of District of Columbia Bar since 2022. Member of Litigation Department.	\$1,320.00	2.40	\$3,168.00
Lisner, Alexandra T.	Associate. Joined firm in 2022. Member of New York Bar since 2023. Member of Restructuring Department.	\$1,320.00	48.50	\$64,020.00
McKenzie, Robert A.	Associate. Joined firm in 2022. Member of New York Bar since 2024. Member of Restructuring Department.	\$1,320.00	19.10	\$25,212.00
Savelski, Julian	Associate. Joined firm in 2022. Member of California Bar since 2022. Member of Corporate Department.	\$1,320.00	80.40	\$106,128.00
Gallucci, Mary A.	Associate. Joined firm in 2022. Member of New York Bar since 2023. Member of Corporate Department.	\$1,320.00	73.00	\$96,360.00
Hasan, Shoumick	Associate. Joined firm in 2025. Member of New York Bar since 2023. Member of Corporate Department.	\$1,320.00	109.00	\$143,880.00
Danilenko, Jennifer	Associate. Joined firm in 2023. Member of New York Bar since 2024. Member of Corporate Department.	\$1,145.00	32.60	\$37,327.00
Clevenger, Blake	Associate. Joined firm in 2023. Member of New York Bar since 2024. Member of Corporate Department.	\$1,145.00	63.40	\$72,593.00
Licari, Montana	Associate. Joined firm in 2025. Member of New York Bar since 2025. Member of Restructuring Department.	\$1,145.00	20.10	\$23,014.50
Li, Ruoyun	Associate. Joined firm in 2024. Member of New York Bar since 2025.	\$975.00	51.60	\$50,310.00
Shin, Joyce Youngseo	Associate. Joined firm in 2024. Member of New York Bar since 2025.	\$975.00	12.80	\$12,480.00
Han, Alice	Associate. Joined firm in 2024. Member of California Bar since 2024.	\$975.00	82.40	\$80,340.00
Tarrant, Christopher M.	Senior Paralegal. Joined firm in 2022.	\$650.00	5.10	\$3,315.00
Bond, Jennifer	Corporate Transaction Lawyer. Joined firm in 2022. England and Wales (Solicitor), 2010.	\$595.00	2.30	\$1,368.50
Lee, Mary K.	Corporate Transaction Lawyer. Joined firm in 2022. Member of Texas Bar since 2019.	\$595.00	2.40	\$1,428.00

**Grand Total**  
**Total Hours**  
**Blended Rate<sup>5</sup>**

**\$3,073,816.75**  
**1,937.80**  
**\$1,586.24**

<sup>5</sup> The blended rate is calculated based on the hourly rates for all professionals and paraprofessionals.

**COMPENSATION BY PROJECT CATEGORY**

<b>Project Category<sup>6</sup></b>	<b>Total Hours</b>	<b>Total Fees</b>
Asset Disposition/Asset Sales	1498.20	\$2,356,059.50
Automatic Stay Issues/Motions for Relief From Stay	0.90	\$1,471.50
Business Operations/Strategic Planning	12.40	\$22,321.00
Case Administration (Docket, WIP and Calendar Updates)	5.50	\$9,636.50
Claims Administration and Objections	0.40	\$654.00
Corporate Governance and Board Matters	7.30	\$12,947.50
Creditors Committee Matters	4.70	\$7,195.00
Employee Matters (including Benefits/Pensions)	24.20	\$38,418.50
Financing and Cash Collateral	136.40	\$237,495.50
General Case Strategy (WIP Calls, Team and Client Calls)	15.90	\$27,093.00
Hearings	40.70	\$68,443.50
Insurance	5.50	\$10,476.00
International / Foreign Matters	9.80	\$16,421.00
Leases and Contracts	7.50	\$12,228.50
Litigation Matters	0.50	\$660.00
Meetings and Communications with Creditors	0.50	\$1,047.50
Non-Working Travel Time	25.50	\$22,226.25
Plan and Disclosure Statement/Confirmation/Implementation/Plan Supplement	0.40	\$654.00
Regulatory Matters	81.30	\$134,319.50
Reports and Schedules	2.60	\$4,573.00
Retention/Fee Matters (L&W)	40.00	\$59,286.50
Retention/Fee Matters/Objections (Others)	8.50	\$13,276.50
Tax Matters	7.10	\$12,952.50
U.S. Trustee Matters	2.00	\$3,960.00
<b>Grand Total</b>	<b>1,937.80</b>	<b>\$3,073,816.75</b>

<sup>6</sup> All non-working travel time has been billed at 50% of the normal hourly rate.

**EXPENSE SUMMARY**

<b>Expense Category</b>	<b>Total Expenses</b>
Airfare	\$1,701.56
Ground Transportation - Local	\$1,000.83
Ground Transportation - Out-Of-Town	\$700.25
Laser Print	\$152.00
Lodging - Out of Town	\$1,396.41
Meals - Local	\$593.65
Meals - Out-of-Town	\$138.83
Other Database Research	\$38.30
Outside Services - Non-Attorney	\$212.50
<b>Total</b>	<b>\$5,934.33</b>

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:	:	Chapter 11
	:	
ZEN JV, LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 25-11195 (JKS)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	<b>Objection Deadline:</b>
	:	<b>September 15, 2025 at 4:00 p.m. (ET)</b>
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**FIRST MONTHLY APPLICATION OF LATHAM & WATKINS LLP  
FOR COMPENSATION FOR SERVICES RENDERED  
AND REIMBURSEMENT OF EXPENSES INCURRED AS BANKRUPTCY  
COUNSEL FOR THE PERIOD FROM JUNE 24, 2025 THROUGH JULY 31, 2025**

Pursuant to sections 330 and 331 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”), and the *Order Pursuant to 11 U.S.C. §§ 331, 330, AND 105(a) and Fed. R. Bankr. P. 2016 (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, and (II) Granting Related Relief* [Docket No. 258] (the “**Interim Compensation Order**”), Latham & Watkins LLP (“**L&W**”) hereby files this application (the “**Application**”) seeking a monthly allowance with respect to the sum of \$3,073,816.75 (80% of which equals \$2,459,053.40) as compensation and \$5,934.33 as reimbursement of actual and necessary expenses, for a total of \$3,079,751.08 for the period from

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

June 24, 2025 through and including July 31, 2025 (the “**Compensation Period**”). In support of this Application, L&W respectfully represents as follows:

**Background**

1. On June 24, 2025 (the “**Petition Date**”), the Debtors each commenced with this Court a voluntary case under chapter 11 of the Bankruptcy Code (collectively, the “**Chapter 11 Cases**”). The Debtors are authorized to continue to operate their business and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. No trustee or examiner has been appointed in these Chapter 11 Cases. On July 2, 2025, the United States Trustee for the District of Delaware (the “**U.S. Trustee**”) appointed an official committee of unsecured creditors (the “**Creditors’ Committee**”) [Docket No. 65].

3. The Debtors’ chapter 11 cases are being jointly administered pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1.

4. Additional information regarding the Debtors’ business and capital structure and the circumstances leading to the commencement of these chapter 11 cases is set forth in the *Declaration of Michael Suhajda, Chief Financial Officer, in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 36], filed on June 26, 2026, which is fully incorporated herein by reference.<sup>2</sup>

5. L&W was retained effective as of the Petition Date by this Court’s Order, dated August 11, 2025 [Docket No. 297] (the “**Retention Order**”). The Retention Order authorized L&W to be compensated on an hourly basis and to be reimbursed for actual and necessary out-of-pocket expenses.

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the First Day Declaration.



**Compensation Paid and Its Source**

6. All services for which L&W is requesting compensation were performed for or on behalf of the Debtors.

7. L&W has received no payment and no promises for payment from any source for services rendered or to be rendered in connection with the matters covered by this Application.

8. Pursuant to Bankruptcy Rule 2016(b), L&W has not shared, nor has L&W agreed to share, (a) any compensation it has received or may receive with another party or person other than with the partners, counsel, and associates of L&W, or (b) any compensation another party or person has received or may receive.

**Fee Statement**

9. The fee statement for the Compensation Period is attached hereto as Exhibit A. This statement contains daily time logs describing the time spent by each professional and paraprofessional for this period. To the best of L&W's knowledge, this Application complies with Sections 330 and 331 of the Bankruptcy Code, Local Rule 2016-2, all other applicable Bankruptcy Rules, the Guidelines adopted by the Office of the United States Trustee, and the Interim Compensation Order.

**Actual and Necessary Expenses**

10. A summary of actual and necessary expenses and daily logs of expenses incurred by L&W during the Compensation Period is attached hereto as Exhibit B. Pursuant to Local Rule 2016-2, L&W represents that it will charge for copying at a rate of \$0.10 per page. There is no charge for incoming or outgoing telecopier transmissions.

11. L&W believes the foregoing rates are the market rates that law firms charge clients for such expenses. In addition, L&W believes that such charges are in accordance with the

American Bar Association's ("**ABA**") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

**Summary of Services by Project**

12. The actual, reasonable, and necessary services rendered by L&W during the Compensation Period can be grouped into the categories set forth below. These categories are generally described below, with a more detailed description of the services provided set forth on the attached Exhibit A. The professionals and paraprofessionals who rendered services relating to each category are identified, along with the number of hours for each individual and the total compensation sought for each category, in Exhibit A attached hereto.

**A. Asset Disposition/Asset Sales**

**Fees: \$2,356,059.50                      Total Hours: 1,498.20**

13. This category includes time spent by L&W attorneys and paraprofessionals in connection with the Debtors' sale process. Specifically, L&W attorneys spent time (a) drafting, reviewing, analyzing and negotiating sale-related documents, including (i) bid documents from and asset purchase agreements with the Debtors' twelve "qualified bidders," (ii) a proposed bidding procedures order, (iii) three proposed sale orders, and (iv) related notices; (b) communicating and negotiating with various stakeholders with respect to the sale process, including the Debtors' twelve "qualified bidders," the Debtors' DIP lender, and the Unsecured Creditors' Committee; (c) researching, analyzing, and providing advice regarding various issues related to the sale process; (d) coordinating with the Debtors' other professionals with respect to the sale process; (e) preparing for and conducting three auctions for all or substantially all of the Debtors' assets [*see* Docket No. 194]; and (f) executing, facilitating, and advising on the closing

of the Debtors' three sales of substantially all their assets for approximately \$69 million of total consideration, which sales closed on July 30, 2025 [see Docket Nos. 266, 267, & 269].

**B. Automatic Stay Issues/Motions for Relief From Stay**

**Fees: \$1,471.50**

**Total Hours: 0.90**

14. This category includes time spent by L&W attorneys and paraprofessionals in connection with advising the Debtors regarding enforcement of the automatic stay against certain vendors threatening to refuse performance.

**C. Business Operations/Strategic Planning**

**Fees: \$22,321.00**

**Total Hours: 12.40**

15. This category includes time spent by L&W attorneys to maintain the Debtors' business operations with minimal disruptions during the Chapter 11 Cases. Specifically, L&W attorneys spent time responding to various operational issues, including analyzing and providing advice regarding the Debtors' cash management system, business operations, vendor contracts, and communications strategy.

**D. Case Administration (Docket, WIP and Calendar Updates)**

**Fees: \$9,636.50**

**Total Hours: 5.50**

16. This category includes services rendered in connection with, among other things, (a) coordinating with Debtors' co-bankruptcy counsel in connection with various logistical matters relating to progressing the administration of these Chapter 11 Cases and (b) coordinating the administration of these Chapter 11 Cases by developing timelines, task lists, comprehensive work-in-progress reports and other resources for the Debtors and the Debtor advisor teams.

**E. Claims Administration and Objections**

**Fees: \$654.00**

**Total Hours: 0.40**

17. This category includes services rendered in connection with analyzing claims asserted by a vendor and the underlying documents related thereto.

**F. Corporate Governance and Board Matters**

**Fees: \$12,947.50**

**Total Hours: 7.30**

18. This category includes time spent by L&W attorneys and paraprofessionals relating to corporate governance matters. Specifically, L&W attorneys spent time communicating with the Debtors' directors and officers regarding chapter 11 related matters, preparing and revising meeting minutes of the Board and Strategic Transaction Committee, and preparing for, attending, and presenting at a board meeting to update the Debtors' board on these Chapter 11 Cases.

**G. Creditors' Committee Matters**

**Fees: \$7,195.00**

**Total Hours: 4.70**

19. This category includes time spent by L&W attorneys and paraprofessionals in connection with negotiations and discussions with the Creditors' Committee advisors, including (a) responding to diligence related inquiries, relevant case background and case timing considerations, (b) participating in meetings to discuss the Creditors' Committee's request for document production and matters related to their investigation of matters related to the Challenge Period and investigation of potential estate claims and causes of action, and (c) meetings to discuss other key matters related to these Chapter 11 Cases.

**H. Employee Matters (including Benefits/Pensions)**

**Fees: \$38,418.50**

**Total Hours: 24.20**

20. This category includes time spent on matters relating to the Debtors' employee relations, including analyzing and providing advice regarding employee termination, benefits, and compensation.

**I. Financing and Cash Collateral**

**Fees: \$237,495.50**

**Total Hours: 136.40**

21. This category includes time spent on matters relating to the Debtors' use of cash collateral and debtor-in-possession financing, including, among other things: (a) drafting, negotiating, and revising the terms of the Debtors' debtor-in-possession financing facility, including the definitive financing term sheet; (b) drafting, negotiating, and revising the interim and final orders relating to the debtor-in-possession financing and use of cash collateral, among other things; (c) preparing for and participating in the hearings to consider entry of the interim and final debtor-in-possession financing orders; (d) negotiating with key stakeholders regarding the terms of financing including as it relates to budget/variance reporting obligations, milestones and other material components; and (e) conferring and corresponding with the Debtors and their other advisors concerning financing matters, including compliance with order requirements and strategy.

**J. General Case Strategy (WIP Calls, Team and Client Calls)**

**Fees: \$27,093.00**

**Total Hours: 15.90**

22. This category includes time spent by L&W attorneys and paraprofessionals preparing for and attending scheduled work-in-progress meetings among L&W professionals and the Debtors' other advisors to analyze and address ongoing issues and workstreams in these Chapter 11 Cases.

**K. Hearings**

**Fees: \$68,443.50**

**Total Hours: 40.70**

23. This category includes time spent on matters relating to the preparation for and participation in the Debtors' first-day hearing, bid procedures hearing, and sale/DIP hearing.

**L. Insurance**

**Fees: \$10,476.00**

**Total Hours: 5.50**

24. This category includes time spent on matters relating to the Debtors' insurance policies or coverage, including reviewing and analyzing operative policies and related documents and advising the Debtors regarding various insurance related topics.

**M. International / Foreign Matters**

**Fees: \$16,421.00**

**Total Hours: 9.80**

25. This category includes time spent on matters relating to (a) the Debtors' relationships and intercompany transactions with their non-U.S. affiliates, and (b) the inter-related operations and workforce of such affiliates in connection with the Debtors' U.S. operations, the Debtors' U.S. sale efforts, these Chapter 11 Cases, and related issues.

**N. Leases and Contracts**

**Fees: \$12,228.50**

**Total Hours: 7.50**

26. This category includes time spent by L&W attorneys and paraprofessionals in connection with the analysis of executory contracts and unexpired leases, including the rejection of certain leases and the cure costs associated with the potential assumption of executory contracts.

**O. Litigation Matters**

**Fees: \$660.00**

**Total Hours: 0.50**

27. This category includes time spent by L&W attorneys and paraprofessionals drafting a suggestion of bankruptcy to be filed in non-bankruptcy litigation matters.

**P. Meetings and Communications with Creditors**

**Fees: \$1,047.50**

**Total Hours: 0.50**

28. This category includes time spent by L&W attorneys and paraprofessionals discussing the status of these Chapter 11 Cases and related matters with creditors upon their request.

**Q. Non-Working Travel Time<sup>3</sup>**

**Fees: \$22,226.25**

**Total Hours: 25.50**

29. This category includes all travel time not otherwise chargeable.

**R. Plan and Disclosure Statement / Confirmation / Implementation / Plan Supplement**

**Fees: \$654.00**

**Total Hours: 0.40**

30. This category includes time spent by L&W attorneys and paraprofessionals in connection with the Debtors' chapter 11 plan, including research regarding certain plan issues.

**S. Regulatory Matters**

**Fees: \$134,319.50**

**Total Hours: 81.30**

31. This category includes time spent by L&W attorneys and paraprofessionals in connection with regulatory matters associated with the sales of the Debtors' assets, including with respect to CFIUS, FedRamp authorization, the transfer of consumer data, and discussions with the Court-appointed consumer privacy ombudsman.

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<sup>3</sup> All non-working travel time has been billed at 50% of the normal hourly rate.

**T. Reports and Schedules**

**Fees: \$4,573.00**

**Total Hours: 2.60**

32. This category includes time spent on matters relating to the preparation and review of the Debtors' schedules and statements, the review of a motion to extend the Debtors' deadline to file Bankruptcy Rule 2015.3 reports, and the preparation for the Debtors' section 341 meeting with creditors.

**U. Retention/Fee Matters (L&W)**

**Fees: \$59,286.50**

**Total Hours: 40.00**

33. This category includes time spent on matters relating to preparing L&W's application to be retained as co-counsel to the Debtors, including a proposed order and related declarations.

**V. Retention/Fee Matters/Objections (Others)**

**Fees: \$13,276.50**

**Total Hours: 8.50**

34. This category includes time spent on matters relating to the retention and compensation of professionals other than L&W, including: (a) reviewing and commenting on a motion establishing procedures for interim compensation of professionals; (b) reviewing and revising the Debtors' engagement letter with certain of its other advisors; (c) addressing client inquiries related to the retention of professionals; and (d) analyzing other issues related to the retention of other advisors.

**W. Tax Matters**

**Fees: \$12,952.50**

**Total Hours: 7.10**

35. This category includes time spent on tax issues, including the tax analysis of various sale proposals and documents.



**X. US Trustee Matters**

**Fees: \$3,960.00**

**Total Hours: 2.00**

36. This category includes time spent on communications with the U.S. Trustee, including coordinating with the Debtors' co-bankruptcy counsel in connection with reviewing and responding to the U.S. Trustee's comments to various pleadings, key case events, various relief sought related to the administration of the chapter 11 cases, and participating on teleconferences regarding various matters involving the U.S. Trustee.

**Valuation of Services**

37. Attorneys and paraprofessionals of L&W have expended a total of 1,937.80 hours in connection with this matter during the Compensation Period. The nature of the work performed by these persons is fully set forth in Exhibit A attached hereto. The hourly rates set forth in Exhibit A are L&W's normal hourly rates for work of this character. The reasonable value of the services rendered by L&W to the Debtors during the Compensation Period is \$3,073,816.75.

38. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by L&W is fair and reasonable given (a) the complexity of these cases, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services in other cases under this title. Moreover, L&W has reviewed the requirements of Local Rule 2016-2 and believes that this Application complies with that Local Rule.

WHEREFORE, L&W respectfully requests that the Court authorize that, for the Compensation Period, an allowance be made to L&W pursuant to the terms of the Interim Compensation Order with respect to the sum of \$3,073,816.75 as compensation for necessary professional services rendered (80% of which equals \$2,459,053.40), and the sum of \$5,934.33 as reimbursement of actual necessary costs and expenses, for a total of \$3,079,751.08, and that the sum of \$2,464,987.73 (80% of fees and 100% of expenses) be authorized for payment and for such other and further relief as this Court may deem just and proper.

*[Space intentionally left blank]*

Dated: August 25, 2025  
Wilmington, Delaware

Respectfully Submitted,

/s/ Candace M. Arthur

**LATHAM & WATKINS LLP**

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*Counsel for the Debtors and Debtors in Possession*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	X	
	:	Chapter 11
	:	
ZEN JV, LLC, <i>et al.</i> , <sup>1</sup>	:	Case No. 25-11195 (JKS)
	:	
Debtors.	:	(Jointly Administered)
	:	
	X	

**DECLARATION OF CANDACE M. ARTHUR**

1. I am a partner with the applicant firm, Latham & Watkins LLP (the “**Firm**”), and have been admitted to the bar of the State of New York since 2010. I make this certification in accordance with Rule 2016-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “**Local Rules**”).

2. I am familiar with the work performed on behalf of the Debtors<sup>2</sup> by the Firm’s professionals. I have reviewed the *First Monthly Application of Latham & Watkins LLP for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Bankruptcy Counsel to the Debtors for the Period from June 24, 2025 Through July 31, 2025* (the “**Application**”), and the facts set forth therein are true and correct to the best of my knowledge, information, and belief.

3. Moreover, I have reviewed Local Rule 2016-2 and, to the best of my knowledge, information, and belief formed upon the basis of my participation in these cases, as well as after

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each debtor’s federal tax identification number (to the extent applicable), are: Zen JV, LLC (0225); Monster Worldwide LLC (6555); FastWeb, LLC; Monster Government Solutions, LLC (5762); Camaro Acquisition, LLC; CareerBuilder, LLC (6495); CareerBuilder Government Solutions, LLC (6426); Luceo Solutions, LLC (4426); CareerBuilder France Holding, LLC (9339); and Military Advantage, LLC (9508). The Debtors’ address is 200 N LaSalle Street #900, Chicago, IL 60601.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application (as defined herein).

reasonable inquiry, the facts set forth in the Application materially comply with the provisions of the Local Rules, the Bankruptcy Code, and this Court's orders.

Date: August 25, 2025  
New York, New York

/s/ Candace M. Arthur  
Candace M. Arthur